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3 Attorney for Defendant
4 Jatinbhai Bhakta

5 **UNITED STATES DISTRICT COURT**
6 **EASTERN DISTRICT OF CALIFORNIA**

7 UNITED STATES OF AMERICA,

Case No. 1:21-CR-00023-NONE-SKO

8 Plaintiff,

9 vs.

10 JATINBHAI BHAKTA,

11 Defendant

12 **STIPULATION TO MODIFY RELEASE
TERMS FOR DEFENDANT &
ORDER**

13 The Defendant, JATINBHAI BHAKTA, by and through his attorney of record, Jared M.
14 Thompson, and the United States of America, by and through its attorney of record, David
15 Gappa, hereby stipulate to modify the defendant's conditions of release as follows:

- 16 1. Defendant Bhakta must not be employed in any capacity in any hotel/motel industry, with the
17 sole exception that he may work for his mother Sharda Bhakta's hotel, the Jackson Hotel,
18 located at 714 Jackson St., Bakersfield, CA 93305. Any employment, or work performed by
19 the defendant, at the Jackson Hotel must be at the direction of Sharda Bhakta, and the
defendant cannot be employed in a managerial or supervisory capacity at the Jackson Hotel.
20 2. All other conditions of release remain in full force and effect as set forth in his original
21 conditions of release.
22 3. On May 18, 2021, Pre-trial Services Officer Frank Guerrero advised both counsel for the
23 government and defense counsel that Mr. Bhakta has been in full compliance with his release
24 conditions since being released from custody. Pre-Trial Services has no objection to the
25 modifications contained herein.

1 **IT IS SO STIPULATED.**

2 DATED: June 3, 2021

3 Brehmer Law Corporation

4 By: /s/ Jared M. Thompson
5 Jared M. Thompson, Attorney for
Defendant, Jatinbhai Bhakta

6 DATED: June 3, 2021

7 United States Attorney's Office

8 By: /s/ David Gappa
9 David Gappa
Assistant United States Attorney

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ORDER

IT IS HEREBY ORDERED that Mr. Bhakta's conditions of release are hereby modified as set forth below:

1. Defendant Bhakta must not be employed in any capacity in any hotel/motel industry, with the sole exception that he may work for his mother Sharda Bhakta's hotel, the Jackson Hotel, located at 714 Jackson St., Bakersfield, CA 93305. Any employment, or work performed by the defendant, at the Jackson Hotel must be at the direction of Sharda Bhakta, and the defendant cannot be employed in a managerial or supervisory capacity at the Jackson Hotel.
 2. All other conditions of release remain in full force and effect as set forth in his original conditions of release.
 3. On May 18, 2021, Pre-trial Services Officer Frank Guerrero advised both counsel for the government and defense counsel that Mr. Bhakta has been in full compliance with his release conditions since being released from custody. Pre-Trial Services has no objection to the modifications contained herein.

IT IS SO ORDERED:

IT IS SO ORDERED.

Dated: **June 14, 2021**



UNITED STATES MAGISTRATE JUDGE